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W. W. (Whit) Jordan **Director-Federal Regulatory**

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June 23, 1993

Ex Parte

Ms. Donna R. Searcy Secretary Federal Communications Commission 1919 M Street, Northwest Washington, D.C. 20554

Re: CC Docket No.

Dear Ms. Searcy:

The attached information has been provided today by the undersigned to Mr. Gary Phillips and Mr. Mark Nadel of the Common Carrier Bureau's Policy and Program Planning Division in response to questions raised by Mr. Phillips and Mr. Nadel in connection with the above referenced proceeding.

Please call me if you have any questions.

Sincerely,

Director - Federal Regulatory

Attachment

cc: Gary Phillips
Mark Nadel

No of Conies rec'd

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BILLED PARTY PREFERENCE (BPP) ISSUES

FEDERAL COMMUNICATIONS COMMISSION OFFICE OF THE SECRETARY

0SS7

The OSS7 feature package in the end offices provides for the routing of 0+ and 10XXX traffic over separate trunk groups. Currently, switch logic is coded to first determine how the call will progress (e.g. 1+, 0+), the jurisdiction (interLATA or intraLATA) and then the carrier (e.g. PIC, 10XXX). This feature package provides the necessary software changes to this decision logic in the switch. All 0+ traffic will be routed to an RBOC's Operator Services System (OSS). The OSS will determine the

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Operator Services Statistics

Of the total 0+ IntraLATA Toll calls, 18.2% are handled by an operator.

On 0+ calls, customers default to operators for call handling for a number of reasons, which include:

- . Prefer operator call handling and press # to avoid the automated process
- . Do not have touchtone phones
- . Do not understand the system, which then times out to the operator
- . Fears that the called party will not understand the automated system.

Operators Required for BPP

We estimated that an additional 149 employees would be required for BPP. This estimate was based on an increase in the time required to handle 0- InterLATA calls under BPP. We did not attempt to quantify the additional personnel associated with the 0+ InterLATA calls.

Additional operator assisted times were determined by 0- InterLATA (Operator Transfer Service) call volumes. An incremental increase in Average Work Time (AWT) of 10 seconds was assumed for these calls. Additional costs, such as supervision, days off, vacation, etc. were calculated with standard formulae. Based on these calculations, an additional 149 operators and supervisory personnel were required. The \$5,001,631 equals the total annual

CIID Calling Cards

For an InterLATA 0+ Calling Card call using a carrier's proprietary card, the primary OSS requirement under BPP - carrier identification - is essentially accomplished. We propose to forward these calls, including the proprietary calling card digits collected by our AABS, to the appropriate carrier as an unvalidated calling card call. The carrier would then perform the validation.